

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: MULTIPLAN HEALTH
INSURANCE PROVIDER LITIGATION**

MDL No. 3121

Case No. 1:24-cv-06795

Hon. Matthew F. Kennelly

This document relates to:
All Cases

DECLARATION OF MAURA R. GROSSMAN, J.D., PH.D.

Pursuant to 28 U.S.C. § 1746, I, Maura R. Grossman, declare:

1. I am a Research Professor in the David R. Cheriton School of Computer Science, cross-appointed to the School of Public Health Sciences, at the University of Waterloo; an Adjunct Professor at Osgoode Hall Law School of York University; and an Affiliate Faculty Member of the Vector Institute of Artificial Intelligence, all in Ontario, Canada. I am also an eDiscovery/AI technology attorney and consultant in Buffalo, New York, through my law firm, Maura Grossman Law.
2. I am licensed to practice law in the State of New York and am also a member in good standing of the United States District Courts for the Southern and Eastern Districts of New York.
3. I am filing this declaration as required by Fed. R. Civ. P. § 53(b)(3)(A). I have familiarized myself with the parties and counsel in the above-captioned matter pending in the United States District Court for the Northern District of Illinois, Eastern Division, before the Honorable Matthew F. Kennelly (“This Matter”).
4. I am not aware of any grounds for disqualification under 28 U.S.C. § 455 that would prevent me from serving as a Special Master in This Matter. However, out of an abundance of caution, I would like to make the following disclosures:

- A. One or more of the Blue Cross Blue Shield or related entities in This Matter are parties in the *BCBSM, Inc., et al. v. Walgreen Co., et al.* matter (Case No. 1:20-cv-01853), also pending in the Northern District of Illinois, Eastern Division, before the Honorable Virginia M. Kendall, where I served as a Special Matter. My technology assisted review (“TAR”)-related work on that matter is now complete.
 - B. Since June 2016, when I first opened Maura Grossman Law, I have performed some time- and scope-limited work as a consultant or TAR service provider for the following firms or lawyers listed on the docket sheet for This Matter: Berger & Montague, PC; Clifford Law Offices; Hartley LLP; McKool Smith; Sarah LaFreniere (when she was employed at Hausfeld LLP); Seeger Weiss LLP; and Williams & Connolly LLP.
 - C. I do not believe that my prior, limited, short-term engagements in these unrelated matters will exert any impact whatsoever on my decision-making or impartiality in This Matter,
5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of November, 2025 in Waterloo, Ontario, Canada.

Maura R. Grossman, J.D., Ph.D.